

FILED

2025 MAR 28 AM 10:14

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

US DISTRICT COURT
EASTERN DIST. TENN.

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD KELLEY

Defendant.

Case No.: 3:22-CR-118-TAV

MOTION TO INTERVENE

William Taylor moves this Court for leave to formally intervene in the above styled and numbered case to protect and enforce his federal rights as an identified federal crime victim pursuant to 18 U.S.C. § 3771. *See* 18 U.S.C. § 3771(a) (listing such rights); 18 U.S.C. § 3771(d)(1) (authorizing the assertion of such rights); and 18 U.S.C. § 3771(d)(3) (providing that such rights be asserted in the district court in which defendant is being prosecuted or where the crime occurred). In support thereof, William Taylor states:

1. Edward Kelley (“Defendant Kelley” or “Kelley”) was convicted in this Court on November 20, 2024, on three counts: (1) solicitation to commit a crime of violence; (2) conspiracy to murder; and (3) influencing, impeding, or retaliating by threatening or injuring a federal official or family member of numerous current and former FBI employees whose names appeared on a hit list created by Kelley.

2. William Taylor is a former FBI employee whose name appeared on Defendant Kelley’s hit list and who is one of the FBI employees Defendant Kelley

3. William Taylor is, therefore, a federal crime victim in this case. *See* 18 § U.S.C. 3771(e)(2) and 28 C.F.R. 45.10(a) (defining federal crime victim as a person directly and proximately harmed by the commission of a federal offense).

4. Defendant Kelley has not yet been sentenced in this case. His sentencing is currently scheduled for May 7, 2025.

5. Along with this Motion to Intervene, William Taylor is filing a Motion for Relief to protect, and to remedy violations of, his rights under 18 U.S.C. § 3771(a) and the Court's Sealing Orders; a Brief in Support of the Motion for Relief; and a *Pro Hac Vice* application seeking to allow his undersigned counsel to officially appear and represent him in this Court on these matters.

Date: March 28, 2025

/s/ Matt M. Dummermuth
Matt M. Dummermuth
(*Pro Hac Vice* admission
pending)
BINNALL LAW GROUP, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
Phone: (703) 888-1943
Fax: (703) 888-1930
Email: matt@binnall.com

Counsel for William Taylor

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2025, a true and correct copy of the foregoing
was served by first class mail and electronic mail on:

Mark E Brown

Menefee & Brown, P.C.
2633 Kingston Pike
Suite 100
Knoxville, TN 37919
865-357-9800
Fax: 865-357-9810
Email: mbrown@menefeebrown.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: CJA Appointment

Casey Thomas Arrowood

U S Department of Justice (Knox USAO)
Office of U S Attorney
800 Market Street
Suite 211
Knoxville, TN 37902
(865) 225-1720
Email: casey.arrowood2@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: United States Attorney

Kyle J Wilson

U S Department of Justice (Chattanooga USAO)
Office of U S Attorney
1110 Market Street
Suite 515
Chattanooga, TN 37402
423-752-5140
Email: kyle.wilson@usdoj.gov
ATTORNEY TO BE NOTICED
Designation: United States Attorney

/s/ Matt M. Dummermuth
Matt M. Dummermuth
Counsel for William Taylor